

March 29, 2021

Ms. Nancy Rumrill
U.S. Environmental Protection Agency, Region 9
Drinking Water Protection Services, WTR-3-2
75 Hawthorne Street
San Francisco, California 94105

Re: Transmittal of Supplemental Information in Support of Application for Underground Injection Control (UIC) Permit, Florence Copper Project, Florence, Arizona

Dear Ms. Rumrill:

As you know, Florence Copper Inc. (Florence Copper) would be required, as a condition of the above-referenced UIC permit, to plug and abandon certain wells that are located within the permit's Area of Review (AOR) prior to the commencement of in-situ copper recovery (ISCR) operations under the permit. The wells that would be plugged and abandoned are listed in Table A-7 of Florence Copper's October 4, 2019 application for the UIC permit (Application). They include two irrigation wells, designated BIA-9 and BIA-10B, which are part of the San Carlos Irrigation Project.

Against the possibility that the Bureau of Indian Affairs would not permit the abandonment of BIA-9 and BIA-10B absent their replacement with irrigation wells of similar production capacity, Florence Copper has commenced installation and development of two new irrigation wells, designated N1 and N2. Operation of N1 and N2, both of which are hydraulically upgradient of the planned ISCR wellfield, would replace the production capacity from BIA-9 and BIA-10B.

In order to assess the geohydrological and other environmental effects of operating irrigation wells N1 and N2, in addition to the abandonment of the wells listed in Table A-7, Haley & Aldrich, Inc. (Haley & Aldrich), at Florence Copper's request, conducted representative groundwater-flow simulations. Each of the simulations was run using the groundwater model described in Attachment A of the Application. The simulations employed model inputs, configuration, and time intervals that are nearly identical to those used in Florence Copper's previous model submittals in support of the Application, except for the addition of the operation of wells N1 and N2, and the update of planned pumping to support facility operations. The simulations and their results are discussed in a Technical Memorandum prepared by Haley & Aldrich, which is enclosed with this letter (Memorandum).

Florence Copper hereby submits the Memorandum, including the related model files and this letter as Exhibit A-8 of the Application and requests that the U.S. Environmental Protection Agency consider them as part of its review of the Application.

Please contact me at 520-316-3710 if you require additional information.

Thank you.

Sincerely,
Florence Copper Inc.

 FOR BRENT BERG

Brent Berg
General Manager

cc: Maribeth Greenslade, Arizona Department of Environmental Quality
Dustin Minor, Assistant Regional Counsel, U.S. Environmental Protection Agency Region 9

Enclosure:
Haley & Aldrich's March 29, 2021 Technical Memorandum